

EXHIBIT 8

In the Matter Of:

Henry vs

Brown University

JOHN MCLAUGHLIN

July 12, 2023



100

1 Q. While you were at Penn, was
2 there an office that was termed
3 development or advancement?

4 A. The university does have a
5 development office.

6 Q. And what is the head of that
7 office termed?

8 A. I don't know.

9 Q. What does that office do?

10 MR. GRINGER: Objection.
11 Foundation.

12 THE WITNESS: I don't know
13 specifics of what they do.

14 BY MR. RAYMAR:

15 Q. Did you have any interaction
16 with the development office when you were
17 at the Penn admissions office?

18 MR. GRINGER: Object to
19 form. Vague.

20 THE WITNESS: I can't recall
21 any interaction with the
22 development office.

23 BY MR. RAYMAR:

24 Q. While you were in the Penn

1 admissions office, who was the president
2 of Penn?

3 A. It was Amy Gutmann.

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

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9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

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Q. And how many times during an

admissions cycle does Penn release

application decisions?

A. We have an early decision

round, so students would apply by

November and receive decisions in

December.

1 building felt like a basement, and then
2 half the building felt like, you know,
3 you could walk out, you could walk
4 outside.

5 The president's office was
6 either on the first or second floor. So
7 above the admission office.

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21 BY MR. RAYMAR:

22 Q. And who was the new dean of
23 admissions?

24 A. Whitney Soule.

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[REDACTED]
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[REDACTED] during your tenure was Penn
need-blind with respect to applications
to the four schools you listed?

MR. GRINGER: Object to
form.

THE WITNESS: Yes. We were
need-blind for U.S. citizen and
permanent residents, Canadian
citizen and permanent residents,
Mexican citizen and permanent
residents.

We were need-aware for those
four schools for international
citizens of other nations.

So for students from -- that
fall into that category, going
back to the earlier definition of
foreign financial aid, those
students would be considered under
a need-aware framework, which
means that it was -- it was more

1 Is that accurate to your
2 knowledge?

3 A. No. It doesn't reflect my
4 experience in working at Penn and seeing
5 how we work through the waitlist.

6 You know, Sara, in her -- in
7 her present role, she makes money by
8 sensationalizing admissions, and, you
9 know, I don't think that's a fair
10 representation of the work that I've done
11 during my time at Penn.

12 Q. In your time at Penn, has
13 the president's office, to your
14 knowledge, ever asked the admissions
15 office to move a waitlisted applicant to
16 admit?

17 A. Never. I've never heard or
18 seen that.

19 Q. And to your knowledge,
20 during your tenure at Penn, has the
21 development office ever asked that an
22 applicant be moved from the waitlist to
23 admit status?

24 A. I've never heard or seen

1 that.

2 MR. RAYMAR: Give me Tab 52.

3 (Document marked for
4 identification as McLaughlin
5 Exhibit 23.)

6 BY MR. RAYMAR:

7 Q. It may make sense to take a
8 look at this from the bottom to the top.
9 But you're entitled to look at it in
10 whatever order you'd like to.

11 And my question is going to
12 be, do you know anything about this set
13 of e-mails?

14 A. No. It's not familiar to
15 me.

16 Q. And were the circumstances,
17 or the incident, or the vignette, or the
18 anecdote, or whatever you want to call
19 it, familiar to you from hearing about it
20 in the admissions office at Penn?

21 MR. GRINGER: Objection.
22 Too many objections to list to
23 that one.

24 THE WITNESS: I've never

233

1 undergraduate admission did you review?

2 A. Thousands.

3 Q. More than 2,000?

4 A. More than 10,000.

5 Q. More than 10,000.

6 Of the more than 10,000

7 applications you reviewed during your

8 time at the University of Pennsylvania in

9 the admissions office for more than ten

10 years, how many otherwise unqualified

11 applicants were admitted because of an

12 actual or potential donation from one of

13 their family members?

14 A. Zero.

15 Q. Stepping back for a minute,

16 Mr. Raymar asked you a lot of questions

17 without, I think, sort of getting some

18 basic facts in the record. And I want to

19 just take a few minutes to do that now so

20 the jury and the court can understand.

21 This is a case proceeding in

22 Chicago, so there may be people not as

23 familiar with the university and with

24 sort of its dynamic.